

2025 Modern Slavery & Human Trafficking Statement

1. Introduction

3P Learning Limited ABN 50 103 827 836 (the **Company** or **we/us**) is a global leader in EdTech programs for reading, writing and mathematics as well as assessments.

We recognise that freedom from slavery is a fundamental human right, and that modern slavery and human trafficking are crimes with severe consequences for victims. In delivering our programs, we are concerned to ensure that we demonstrate and interact with high ethical standards, and identify and remove modern slavery and human trafficking risks from our operations and supply chains.

The Company and its reporting entities publish this statement in accordance with the:

- *Modern Slavery Act 2015 (UK Act)* (United Kingdom);
- *Modern Slavery Act 2018 (Cth) (Act)* (Australia); and
- *Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023) (Canada) (Canadian Act)*

The reporting period for this statement is 1 July 2024 to 30 June 2025.

2. Reporting entities

The Company and each of the reporting entities listed below adopts and submits this statement in accordance with the Act, UK Act and Canadian Act. (The Company's consolidated revenue was AUD\$109.1m as at the financial year ended 30 June 2025.)

Subsidiaries that are reporting entities in this Report:

1. Blake eLearning Pty Ltd (ABN 64 140 998 821)	Australia
2. 3P International Holdings Pty Limited (ACN 169 566 545)	Australia
3. 3P Learning Australia Pty Ltd (ABN 29 135 793 609)	Australia
4. Pairwise Pty Ltd (ABN 69 164 681 618)	Australia
5. Intrepica Pty Ltd (ABN 44 128 896 980)	Australia
6. Blake eLearning UK Limited (02092638)	UK
7. 3P Learning UK Limited (Company number 05919214)	UK
8. 3P Learning Canada Limited (2016828515)	Canada

3. Our corporate structure, operations and supply chains

3.1 Corporate structure

The Company's corporate structure comprises:

Board of Directors	The Board is responsible for setting and overseeing the Company's strategic objectives and performance.
Board Committee	The Audit and Risk Committee is a Board-delegated committee responsible for reviewing the material risks facing the Company and for corporate reporting processes. Members of this committee are non-executive directors of the Company.
Management	Management of day-to-day operations occur under the Chief Executive Officer (CEO) and the executive leadership team.
Business teams	Our operations are delivered by the Product, Technology, Sales, Marketing and Corporate (People and Culture, Finance, Administration) teams.

The reporting entities are wholly owned subsidiaries of the Company. Management oversees the day-to-day operations and reporting of these entities to report, in turn, to the Board Committee and Board.

3.2 Our operations and supply chain activities

Our educational programs and content are designed in-house by the Product and Technology teams. The supply chains we use to deliver programs to customers and students are predominantly made up of global companies providing IT and cloud-based services.

Suppliers and vendors engaged by us	Local and global providers of goods, utilities and services for: physical offices, travel and hospitality, telecommunications, cloud hosting, SAAS, technology, professional services (tax, audit, legal, advisory), design, publishing and printing, and global promotional products.
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Our Sales, Customer Service and Marketing teams manage and coordinate the communications and customer service experience to schools, teachers and parents and the public directly (in person or by email or phone) and via distributors.

Distributors engaged by us	<p>B2B: for school customers we may appoint sub-distributors for their leadership presence in educational services in their local region.</p> <p>B2C: for direct customers (parents) our products are available for subscription online or through app platform providers.</p>
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4. Risks of modern slavery practices in our operations and supply chains

The Company's services and those of its reporting entities are provided by skilled employees under common management and policy frameworks that mitigate risk in our global operations. In relation to external suppliers and distributors of the Company and its reporting entities, our review of their modern slavery risk profiles since 2023 have been undertaken to enable our ongoing framework for onboarding risk assessments for new vendors, and ongoing monitoring of existing vendors.

Our operations

For the Company's operations:

- The significant supply of services and goods to the Company are in relation to utilities, technology and digital marketing vendors.
- Most suppliers are engaged for services in the jurisdictions where 3P Learning's offices are located (Australia, Canada, UK, USA).
- Distributors and resellers of our programs are subject to our onboarding due diligence review.

Based on the above, the Company has assessed the risks of modern slavery practices in its operations and supply chains as low.

Specific assessments

For the Company's operations the assessment of modern slavery risks and steps to manage that risk include:

Areas that carry risk	How we conduct reviews or what we consider in assessments
Technology - Supply chain Hardware, software and SaaS	<ul style="list-style-type: none"> - due diligence - relevant certifications - jurisdiction of domicile and operations - subcontracts - employee profile of the vendor - relevant policies and modern slavery statements - commercial and legal review of contracts
Other goods manufactured – supply chain	
Distribution services and agents	
Services – professional, non-professional, and personal (expert, consultant or social media)	
Services – projects and personal (experts or social media sponsorship arrangements)	

Labour risks

Our policy at 3P Learning is that forced labour and child labour are prohibited in our supply chains and operations.

The 3P Learning People and Culture Committee reviews the Company's people strategy, and this includes the policies and practices of the Company designed to comply with law, encouraging the creation of an 'Employer of Choice' culture and aligning to business requirements and the Company's values.

For the supply chains of the Company and its reporting entities, a review of the risks of prohibited forms of labour (forced labour and child labour) was initiated in 2024 and continue to be adopted. In our global operations, additional focus on production processes and labour standards of vendors and their sub-contractors will apply for vendors deemed non-low risk.

These assessments are continually developed and presently apply a general focus to a range of suppliers and manufacturers while additional considerations are applied for vendors with complex or unclear contracting or supply arrangements. If our assessment results in our view that a vendor cannot be managed to achieve an acceptable 'low' risk rating with relevant due diligence, then 3P Learning considers it may not be willing to engage those vendors.

5. Actions to address modern slavery and human trafficking risks

Activities to assess and address the risks of modern slavery and human trafficking in our operations include: due diligence on suppliers and distributors; ongoing monitoring of suppliers and distributors; and staff training and awareness in relation to Company policies.

The following policies supported our business operations during the reporting period:

- Code of Conduct;
- Anti-Bribery and Corruption Policy; and
- Whistleblower Policy.

During the reporting period, staff training was accompanied by a review of the modern slavery risk rating for operations and supply chains. Areas in the supply chain noted as medium risk were reviewed for its effectiveness of controls. This review maintained the overall assessment of low modern slavery risks in the Company's operations with our current protocols in onboarding service providers and vendors. The Company's risk management processes are monitored by the Audit and Risk Committee, and People and Culture Committee.

Our review of risks through our ongoing and new engagement of vendors continues to be part of the processes that help us to identify key areas to monitor for modern slavery risk. Our steps include:

- Maintaining our review processes for the Company's ongoing monitoring and onboarding steps;
- Reviewing areas of focus for targeted staff training and awareness;
- Reviewing the Modern Slavery Statements of our vendors if available, as part of contract renewal and onboarding; and
- Reviewing and activating internal engagement to discuss our measures and the effectiveness of our actions. Our vendors may be engaged in day-to-day service level discussions, but also more focused discussions with our Risk and Governance Committee.

6. Measuring our effectiveness

We ensure that slavery and human trafficking is not taking place in our operations or supply chains by focusing on due diligence and staff training for those teams and functions that engage suppliers.

The measures to evaluate the effectiveness of our processes to ensure that forced labour and child labour are not being used in our business supply chains continue to be developed. We consider our collation of data, updated monitoring and staff training continues to enable our oversight and periodic risk assessment about our vendors and supply chain. The effectiveness of these processes are reported to the CEO and our Board that reviews this at least annually.

7. Reporting entities consultation

The Company's reporting entities develop and own the intellectual property of, or hold distribution rights for, the education programs of the Company. The review of modern slavery risks of the suppliers and sub-distributors of these entities was completed jointly with input from a range of stakeholders.

Following consultation, the board of directors of the following subsidiaries approved the publication of this statement for the purposes of the UK Act and Canadian Act, respectively:

- 3P Learning Canada Limited, on 3 and 4 December 2025;
- 3P Learning UK Limited on 3 and 4 December 2025;
- Blake eLearning UK Limited on 3 and 4 December 2025;
- Blake eLearning Pty Ltd on 3 and 4 December 2025;
- Intrepica Pty Ltd on 3 and 4 December 2025;
- Pairwise Pty Ltd on 3 and 4 December 2025; and
- 3P International Holdings Pty Limited on 3 and 4 December 2025.

3P Learning Canada Limited – s.11 attestation

In accordance with the requirements of the Canadian Act and in particular section 11 thereof, I, in the capacity of Director, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed within this report.



Jose Palmero
CEO
4 December 2025

8. Approval

This statement was approved by the Board of Directors of 3P Learning Limited, as the principal governing body, on 18 November 2025. The statement was authorised for publication on 16 December 2025.



Matthew Sandblom
Chairman
16 December 2025